

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND,)	
)	
)	
Plaintiff,)	
)	No. 21-2083C
v.)	(Judge Sweeney)
)	
UNITED STATES,)	
)	
Defendant.)	

DEFENDANT'S UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINES

Defendant, the United States, respectfully requests that the Court grant a 77-day enlargement of the discovery deadlines set forth in the Court's June 20, 2023 Order (ECF No. 47) for the conclusion of the period for fact witness depositions and the close of fact discovery, as well as a 75-day enlargement of the deadline for the parties to file a joint status report suggesting further proceedings. This is our sixth request for an extension of a discovery deadline. We have discussed the matter with Ambassador Sondland's counsel, who has informed us that he does not oppose this motion.

Since entry of the Court's initial order setting a schedule for discovery for this case, both parties have encountered discovery delays of various types. Although the parties have worked together to accommodate these delays within the current schedule, an extension of the discovery deadlines is necessary to complete the efforts. Specifically, although the parties have begun the process of scheduling fact witness depositions, the parties are attempting to accommodate the witnesses' schedules, and thus the depositions will not occur before the current September 29, 2023 deadline. Accordingly, a 77-day enlargement of the deadlines for fact witness depositions and the close of fact discovery, as well as a 75-day enlargement of the deadline for a joint status report on further proceedings, in accordance with the chart below, would allow the parties

sufficient time to take depositions and prepare a status report.

Specifically, defendant requests the following extensions:

Event	Current deadline pursuant to ECF No. 47	Proposed new deadline
Conclusion of period for fact witness depositions	September 29, 2023	December 15, 2023
Close of fact discovery	September 29, 2023	December 15, 2023
Joint Status Report suggesting further proceedings	October 6, 2023	December 20, 2023

For the foregoing reasons, we request that the Court grant this motion and enter an order extending the discovery deadlines as set forth above.

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